

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)
ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 21-30589 (MBK)

Judge: Michael B. Kaplan

OFFICIAL COMMITTEE OF TALC CLAIMANTS I,

Appellants,

v.

LTL MANAGEMENT LLC,

Appellee.

Case Nos: 22-cv-01339-FLW
22-cv-01350-FLW
22-cv-01620-FLW

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**DEBTOR’S DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE
RECORD ON APPEAL**

LTL Management LLC, debtor in the above-captioned case and appellee, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedures, hereby submits its designation of additional items to be included in the record on appeal, in addition to the designations submitted by the Official Committee of Talc Claimants I (“TCC I”) in its *Appellant TCC I’s Statement of Issues on Appeal and Designations of Items to be Included in the Record on Appeal as to MTD Opinion and Order* (Dkt. 1832), in connection with TCC I’s appeal to the United States Bankruptcy Court for the District of New Jersey from the February 25, 2022 *Memorandum Opinion denying the Official Committee of Talc Claimants’ Motion to Dismiss* (Dkt. 1572)² (“*MTD Opinion*”) and the implementing *Order* (Dkt. 1603) (“*MTD Order*” and collectively, the “*MTD Opinion and Order*”) (hereinafter “TCC I MTD Appeal”).

Background

1. On March 25, 2022, Arnold & Itkin LLP (“Arnold & Itkin”) filed *Appellant’s Statement of the Issues to be Presented on Appeal and Designation of the Record on Appeal* (Dkt. 1856, Case No. 12 22-cv-1387-FLW), designating items to be included in the record on appeal in connection with its appeal to the United States Bankruptcy Court for the District of New Jersey from the *MTD Order*, which was based on the *MTD Opinion* (hereinafter “Arnold & Itkin Appeal”).

2. On March 23, 2022, TCC I filed *Appellant TCC I’s Statement of Issues on Appeal and Designations of Items to be Included in the Record on Appeal as to MTD Opinion and Order* (Dkt. 1832, Case Nos. 22-cv-1339-FLW, 22-cv-1350-FLW, and 22-cv-1620-FLW), designating

² “Dkt.” shall refer to entries in the Main Case docket (21-30589-MBK) and “Dkt. []”, Adv. Pro. No. 21-03032-MBK” shall refer to entries in the adversary proceeding.

items to be included in the record on appeal in connection with the TCC I MTD Appeal. TCC I also filed *Appellant TCC I's Statement of Issues on Appeal and Designation of Items to be Included in the record on Appeal as to Stay Opinion and Order* (Dkt. 1833, Case Nos. 22-cv-1339-FLW, 22-cv-1350-FLW, and 22-cv-1620-FLW), designating items to be included in the record on appeal in connection with its appeal of the February 25, 2022 implementing Order (Dkt. 1635), (Dkt. 187, Adv. Pro. 21-03032-MBK) (“*Stay Order*”), which implemented the Memorandum Opinion granting stay and injunctive relief (Dkt. 184, Adv. Pro. 21-03032-MBK) (“*Stay Opinion*”), collectively, the “*Stay Opinion and Order*” (hereinafter “TCC I Stay Appeal”).

3. On March 21, 2022, the Official Committee of Talc Claimants II (“TCC II”) filed *Appellants’ Statement of Issues to be Presented on Appeal* (Dkt. 1805) and *Appellants’ Designation of Items to be Included in the Record on Appeal* (Dkt. 1804, Case Nos. 22-cv-01289-FLW, 22-cv-1296-FLW, and 22-cv-01303-FLW), the latter designating items to be included in the record on appeal in connection with its appeal to the United States Bankruptcy Court for the District of New Jersey from the *MTD Order* and the *Stay Order* (hereinafter “TCC II Appeals”).

4. On March 21, 2022, Aylstock, Witkin, Kreis & Overholtz, PLLC (“Aylstock”) filed *Statement of Issues, Designation of Items to be Included in the Record on Appeal, and Certificate Regarding Transcripts* (Dkt. 1801, Case Nos. 22-cv-1280-FLW and 22-cv-1292-FLW), designating items to be included in the record on appeal in connection with its appeal to

the United States Bankruptcy Court for the District of New Jersey from the *MTD Opinion and Order* and the *Stay Opinion and Order* (hereinafter “Aylstock Appeals”).

Additional Items

5. In the TCC I MTD Appeal, LTL Management LLC hereby designates all items designated by Arnold & Itkin in the Arnold & Itkin Appeal, by TCC I in the TCC I Stay Appeal, by TCC II in the TCC II Appeals, and/or by Aylstock in the Aylstock Appeals, but not designated by TCC I in the TCC I MTD Appeal.

Dated: April 6, 2022

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

Paul R. DeFilippo

James N. Lawlor

Brad J. Axelrod (*pro hac vice*)

Lyndon M. Tretter (*pro hac vice*)

Joseph F. Pacelli (*pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

jlawlor@wmd-law.com

baxelrod@wmd-law.com

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jpacelli@wmd-law.com

JONES DAY

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2727 N. Harwood Street

Dallas, Texas 75201

Telephone: (214) 220-3939

Facsimile: (214) 969-5100

gmgordon@jonesday.com

bberens@jonesday.com

dbprieto@jonesday.com

asrush@jonesday.com

(Admitted *pro hac vice*)

James M. Jones

250 Vesey Street

New York, NY 10281-1047

Telephone: (212) 326-3939

Facsimile: (412) 394-7959

jmjones@jonesday.com

(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR